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JUL 27 2009

July 23, 2009

Ms. Christine Kump-Mitchell
Project Coordinator, Hazardous Waste Program
MDNR St. Louis Regional Office
7545 S. Lindbergh, Suite 210
St. Louis, MO 63216

Re: Modine Manufacturing Company – Camdenton, MO
Final RCRA Facility Investigation Report
AOC No. 99-HW-002

RCRA



Dear Ms. Kump-Mitchell:

Please find enclosed one copy of the above-referenced report submitted in accordance with Section VI of AOC No. 99-HW-002 (the "Final RFI"). The draft version of the report submitted on April 10, 2008 was revised consistent with the resolution of Missouri Department of Natural Resources (MDNR), Missouri Department of Health and Senior Services (DHSS), and United States Environmental Protection Agency (USEPA) comments that occurred during the November 7, 2008 phone conference.

In addition, per MDNR's direction, the language in the draft review version (December 2, 2008) of the Environmental Covenant has been incorporated into the report. The final version of the Environmental Covenant is pending MDNR legal and management review. MDNR deemed it appropriate for Modine to include within the RFI the language presented in the Environmental Covenant draft review version for the purposes of presenting the activity and use limitations restricting the property to non-residential land use. The basis for this decision is to document the land use restrictions on the property in the Final RFI Report that will be provided to the public to support the intended site management decision of no further action. In the event that, as currently expected, no relevant significant concerns are raised by the public, Modine based on prior discussions with the MDNR, anticipates that the path forward is site closure with no further action.

Modine acknowledges written and verbal correspondence with MDNR and USEPA regarding trichloroethene (TCE) toxicity values to be used in the human health risk assessment portion of the draft RFI report to assess potential current and future risks to indoor industrial workers. Those communications occurred subsequent to the resolution of comments during the aforementioned November 7, 2008 phone conference. These subsequent discussions were prompted by a January 15, 2009 Office of Solid Waste and Emergency Response (OSWER) guidance memorandum entitled "Interim Recommended Trichloroethylene (TCE) Toxicity Values to Assess Human Health Risk and Recommendations for the Vapor Intrusion Pathway Analysis" (the "January 2009 Memo"). The interim guidance memorandum identified two non-cancer toxicity values as appropriate for consideration and indicated that draft toxicity assessments are generally not appropriate for use. On April 3, 2009, Modine, MDNR, and USEPA participated in a phone conference to discuss the TCE toxicity values in the January 2009 Memo as they pertain to the vapor intrusion pathway. USEPA Region 7 indicated on the phone conference that they felt the use of the New York State Department of Health's (NYSDOH) air criterion presented in the January 2009 Memo is the appropriate TCE toxicity value for evaluating chronic non-cancer health hazards.

While EPA Region VII relied on the January 2009 Memo during the April 3, 2009 teleconference, USEPA Headquarters subsequently, on April 9, 2009, published a memorandum withdrawing the January 2009 Memo in order to further evaluate the recommendations regarding the non-cancer TCE toxicity value for use in risk assessments of inhalation exposures. Thus, rather than address the NYSDOH standard endorsed by the withdrawn January 2009 Memo, the human health risk assessment presented in the enclosed Final RFI is

consistent with the agreements made by Modine with MDNR, DHSS, and USEPA to finalize the report in November 2008.

Please feel free to call me with any questions you may have at (262) 636-1412 or by email at t.e.meitner@na.modine.com.

Sincerely,

A handwritten signature in cursive script, reading "Thomas E. Meitner", followed by a horizontal line.

Thomas E. Meitner
EH&S Manager

Cc: Richard Nussbaum - Missouri Department of Natural Resources
Don Van Dyke - Missouri Department of Natural Resources
Steven Poplawski - Bryan Cave, LLP
David Garrett - EPA Region 7
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